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11 UNITED STATES BANKRUPTCY COURT
 12
 13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 In re
 15 PG&E Corporation,
 16 and
 17 PACIFIC GAS AND ELECTRIC
 18 COMPANY,
 19 Debtors.

20 ☐ Affects PG&E Corporation
 21 ☐ Affects Pacific Gas and Electric Company
 22 ☒ Affects both Debtors

23 *All papers shall be filed in the Lead Case,
 24 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**MOTION PURSUANT TO FED. R.
 BANKR. P. 9006(b)(1) TO ENLARGE THE
 TIME FOR CONNIE SOSNOFF,
 GRANATE SOSNOFF, AND NAYWON
 ZIMMER TO FILE PROOF OF CLAIM**

Date: September 8, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: September 1, 2020
 4:00 p.m. (Pacific Time)

25 Pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure, by this motion
 26 (“Motion”) Connie Sosnoff, Granate Sosnoff, and Naywon Zimmer (“Movants”) seek an order
 27 expanding the time for them to file their proof of claim in these cases, a true copy of which is
 28 attached hereto as Exhibit 1. Movants (through counsel) filed their claim with Prime Clerk on
 August 13, 2020. This Motion is based upon the points and authorities set forth herein and the
 concurrently filed Notice of Hearing and Declaration of Connie Sosnoff (“Sosnoff Decl.”) in

1 support of the Motion, in addition to any evidence or oral argument presented at the time of any
2 hearing on this matter. In support thereof, Movants, by and through their undersigned counsel,
3 respectfully represents as follows:

4 **SUMMARY OF ARGUMENT**

5 The general bar date in these cases was October 21, 2019 ("Original Bar Date"). The
6 process for submission of timely claims has continued after the Original Bar Date. Pursuant to the
7 Stipulation Between Debtors and Official Committee of Tort Claimants to Extend Bar Date for
8 Fire Claimants and for Appointment of Claims Representative (Dkt# 4651), the Original Bar Date
9 was extended for the benefit of Unfiled Fire Claimants to December 31, 2019 at 5:00 p.m.
10 (Prevailing Pacific Time). The Debtors' chapter 11 plan ("Plan") was confirmed by court order on
11 June 20, 2020, and pursuant to the Notice of Effective Date, the Plan became effective as of July
12 1, 2020.

13 This Motion concerns the claims of landowners who suffered losses and damages as a
14 result of the Camp Fire from the destruction of trees on their properties. Movants inherited
15 undeveloped agricultural property in Magalia, California in 2005 but did not suspect it was close
16 enough to the Camp Fire to have been damaged. Movants were informed by a logging company a
17 few weeks ago that the trees on the property were damaged and needed clearing.

18 Application of the so-called *Pioneer* factors shows that Movants' late filing is the result of
19 excusable neglect and therefore permissible under Rule 9006(b)(1). As to the first such factor,
20 Movants' late filing will cause no prejudice to Debtors, inasmuch as the Plan has been confirmed,
21 the associated Fire Victim Trust funded, and so the inclusion of Movants' claim in the pool of fire
22 victim claims will have no impact at all on the Debtors or the bankruptcy estates. As to the second
23 *Pioneer* factor, Movants' delay in filing their claim and any resultant impact on these proceedings
24 are exceedingly modest and immaterial for the same reasons that Debtors will not be prejudiced.
25 As to the third *Pioneer* factor, the reason for the delay and whether it was in Movants' reasonable
26 control, the reason for the delay is as described herein. Movants did not know until a logging
27 company contacted them a few weeks ago that the undeveloped property they inherited from their
28 father in 2005 was damaged by the Camp Fire. Once Movants learned this, they contacted their

1 trusts and estate counsel who promptly referred them to counsel to assist them with filing their
2 Proof of Claim. Movants' counsel promptly filed the Proof of Claim and contacted bankruptcy
3 counsel for assistance in seeking the instant relief. These inquiries demonstrate Movants' good
4 faith, satisfying the fourth *Pioneer* factor. Because consideration of the *Pioneer* factors points
5 overwhelmingly to Movants' neglect having been excusable, late filing of the proof of claim
6 should be permitted.

7 JURISDICTION AND VENUE

8 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,
9 the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24
10 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court
11 for the Northern District of California. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
12 Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate
13 for the relief requested herein is Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure.

14 BACKGROUND

15 As set forth in the Declaration of Connie Sosnoff filed contemporaneously herewith, she
16 contacted her father's trusts and estates counsel in Chico who recommended she contact Reiner,
17 Slaughter & Frankel for representation in pursuing claims for the damage to the trees on their
18 properties from the Camp Fire. Movants were unaware until a few weeks ago that their properties
19 were damaged by the Camp Fire until a logging company called them to ask if they wanted the
20 company to clear some of the property. Movants inherited the properties from their father in 2005,
21 but did not know the approximate location of the property; Movants simply knew it was in the
22 general area near Chico, California. They did not know it was close enough to the Camp Fire to
23 be damaged. The properties are unmarked with no street address. They consist of 40 acres of
24 undeveloped agricultural land in Magalia, California, 95954, Parcel 058-100-094-000, and 89.25
25 acres of undeveloped agricultural land in Magalia, California 95954, Parcel 065-510-083-000.

26 After learning of those circumstances, Movants contacted counsel who referred them to the
27 proper counsel to file the Proof of Claim on their behalf. That counsel promptly did so and
28 contacted bankruptcy counsel for assistance in seeking the instant relief. Movants' proof of claim

1 is limited to damages caused to the trees on their property.

2 **BASIS FOR RELIEF REQUESTED**

3 Bankruptcy Rule 9006(b)(1) allows the enlargement of time for “an act . . . required or
4 allowed to be done at or within a specified period . . . by order of court.” Rule 9006(b)(1) further
5 provides:

6 [T]he court for cause shown may at any time in its discretion (1) with or without
7 motion or notice order the period enlarged if the request therefor is made before the
8 expiration of the period originally prescribed or as extended by a previous order or
(2) on motion made after the expiration of the specified period permit the act to be
done where the failure to act was the result of excusable neglect.

9 Bankruptcy Rule 9006(b)(1). “Excusable neglect” under Bankruptcy Rule 9006(b)(1) is a flexible
10 concept and case law has identified a four non-exclusive factors to be considered:

11 With regard to determining whether a party's neglect of a deadline is excusable . . .
12 we conclude that the determination is at bottom an equitable one, taking account of
13 all relevant circumstances surrounding the party's omission. These include . . . [1]
14 the danger of prejudice to the [nonmovant], [2] the length of the delay and its
15 potential impact on judicial proceedings, [3] the reason for the delay, including
whether it was within the reasonable control of the movant, and [4] whether the
movant acted in good faith.

16 *Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. Partnership*, 507 U.S. 380, 395, 113 S.Ct. 1489,
17 1498 (1993) (citations omitted); *see also In re Orthopedic Bone Screw Prods. Liability Litig.*, 246
18 F.3d 315, 323 (3d Cir. 2001) (citing *Pioneer*, 507 U.S. at 395). Rule 9006(b)(1) allows “late
19 filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening
20 circumstances beyond the party's control.” *Pioneer*, 507 U.S. at 381.

21 In *Pioneer*, a creditor represented by experienced bankruptcy counsel missed the proof of
22 claim deadline because his lawyer overlooked the filing date in the bankruptcy court’s notice. The
23 Supreme Court affirmed the Sixth Circuit’s finding of excusable neglect and endorsed a balancing
24 test, the hallmark of which is consideration of various factors to aid in determining whether a
25 movant’s neglect of a bar date was excusable, thereby justifying a late proof of claim filing. This
26 equitable determination is to “tak[e] account of all relevant circumstances surrounding the party’s
27 omission.” *Id.* at 395, 113 S. Ct. at 1498; *see also Corning v. Corning (In re Zilog, Inc.)*, 450 F.3d
28 996 (9th Cir. 2006) (noting *Pioneer*’s non-exhaustive list of relevant factors). Consideration of all

1 four *Pioneer* factors—as well as a fifth engrafted onto the *Pioneer* analysis by some courts--
2 supports the conclusion that Movants failure to file this proof of claim prior to the general bar date
3 was excusable.

4 Because in this case there is no danger of prejudice to the Debtors, the first *Pioneer* factor
5 weighs overwhelmingly in Movants' favor. *See, e.g., In re O'Brien Env'tl. Energy, Inc.*, 188 F.3d
6 116, 128 (3d Cir. 1999) (overruling bankruptcy court's finding of prejudice when allowing a late
7 claim would not require disgorgement to paid creditors and the claim could not jeopardize the
8 debtor's recovery since debtor was a "large, successful company with annual revenues and
9 earnings in the millions"); *In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015)
10 (citing Scott I. Davidson & Jennifer A. Bender, *Late-Filed Claims are not Always Excluded from*
11 *the Distribution Party*, AM. BANKR. INST. J. 16, 62 (Jan. 2014)) (where unsecured creditors will
12 be made whole, "the debtor will not be able to object to a proof of claim solely on the grounds that
13 the proof of claim was filed after the bar date"); *In re Garden Ridge Corp.*, 348 B.R. 642, 646
14 (Bankr. D. Del. 2006) (finding no prejudice in late claim when payout of the claim would be via
15 preferred stock and would not require any disgorgement of funds already paid out even if it might
16 have affected the amount of preferred stock ultimately available to other creditors). The tininess of
17 Movants' claim relative to Debtors' estates speaks to the absence of prejudice. *See, e.g., In re*
18 *Keene Corp.*, 188 B.R. 903, 910 (Bankr. S.D.N.Y. 1995) (size of the late claim in relation to the
19 estate is a consideration in determining prejudice). Movants only claim is for the damage done to
20 the trees on their undeveloped property.

21 Moreover, any prospect of prejudice is especially unlikely here because of the form of
22 Debtors' Plan, which provided for a lump-sum payment for the benefit of all fire victims. Adding
23 or subtracting claims from the totals does not affect that formulation of the Plan, or in any real
24 way affect the estate. While the Trust has recently been partially funded, distributions from the
25 Trust have not been made, as the Trustee and his professionals and team are in the process of
26 formulating claims resolution calculations and procedures.

27 Consideration of the second *Pioneer* factor, the length of the delay and its potential impact
28 on these proceedings, also strongly favors Movants. Here, although the claims bar date has

passed, there is no substantive impact on these proceedings and the administration of this case. See *In re Lyondell Chemical Co.*, 543 B.R. 400, 410 (Bankr. S.D.N.Y. 2016) (length of delay is only given meaning by its effect on the administration of the case). Movants' late filing, if permitted by the Court, would have little to no appreciable impact on these proceedings.

As to the third *Pioneer* factor, the reason for the delay and whether it was in Movants' reasonable control, again leans in favor of excusability. Movants acknowledge this Court's observation, in 2004, that "[o]n balance, ... the authorities construing *Pioneer* weigh the reasons for the delay factor most heavily." *In re Pacific Gas & Electric, Co.*, 311 B.R. 84, 91 (Bankr. N.D. Cal. 2004) (citing *Graphic Communications Int'l Union, Local 12-N v. Quebecor Printing Providence, Inc.*, 270 F.3d 1 (1st Cir. 2001)).¹ A "satisfactory explanation for the late filing" is required. *Graphic Communications at 5*.

The reason for the delay was that Movants inherited the properties from their father in 2005, but did not know the location of the property; Movants simply knew it was in the general area near Chico, California. They did not know it was close enough to the Camp Fire to be damaged. As soon as a logging company contacted Movants, Movants contacted the same attorney who handled their father's estate. That attorney promptly put Movants in touch with counsel to file their proof of claim and this Motion.

It is also critical to note that an order granting this Motion is of course without prejudice to the rights of relevant parties (the Trustee of the Fire Victim Trust for example) to object to Movants' claim on substantive or legal grounds, other than timeliness.

¹ That said, the Fifth and Eleventh Circuits and courts in at least two other circuits (the Third and the Eighth) have identified the danger of prejudice is the most important of the *Pioneer* factors. See *Greyhound Lines, Inc. v. Rogers (In re Eagle Bus Mfg., Inc.)*, 62 F.3d 730, 737 (5th Cir. 1995) ("Under *Pioneer*, the central inquiry is whether the debtor will be prejudiced."); *Advanced Estimating System, Inc. v. Riney*, 77 F.3d 1322, 1325 (11th Cir. 1996) ("Primary importance should be accorded to the absence of prejudice to the nonmoving party and to the interest of efficient judicial administration."); *In re Cable & Wireless USA, Inc.*, 338 B.R. 609, 614 (Bankr. D. Del. 2006) (quoting *In re Tannen Towers Acquisition Corp.*, 235 B.R. 748, 755 (D.N.J. 1999) ("In applying the *Pioneer* test, courts place the greatest weight on whether any prejudice to the other parties will occur by allowing a late claim."); *Matter of Papp Intern., Inc.*, 189 B.R. 939, 944 (Bankr. D. Neb. 1995) (citing *In re Sacred Heart Hos. of Norristown*, 186 B.R. 891 as suggesting "the most significant [*Pioneer*] factor ... is that of prejudice to the debtor.")).

DOWNEY BRAND LLP

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Connie Sosnoff</u> Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: <u>Granate Sosnoff</u> <u>Naywon Zimmer</u> _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Reiner, Slaughter & Frankel</u> Attorney Name (if applicable) <u>Russell Reiner</u> Attorney Bar Number (if applicable) <u>84461</u> Street Address <u>2851 Park Marina Dr. Suite #200</u> City <u>Redding</u> State <u>California</u> Zip Code <u>96001</u> Phone Number <u>(530) 241-1905</u> Email Address <u>reiner@reinerslaughter.com</u>	Where should payments to the creditor be sent? (if different) Name <u>Eric Ratinoff Law Corp Client Trust</u> Attorney Name (if applicable) <u>Eric J. Ratinoff</u> Attorney Bar Number (if applicable) <u>166204</u> Street Address <u>401 Watt Avenue</u> City <u>Sacramento</u> State <u>CA</u> Zip Code <u>95864</u> Phone Number <u>(916) 970-9100</u> Email Address <u>nziegler@ericratinoff.com</u>
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2:**Give Information About the Claim as of the Date this Claim Form is Filed****7. What fire is the basis of your claim?**

Check all that apply.

- ☒ Camp Fire (2018)
☐ North Bay Fires (2017)
☐ Ghost Ship Fire (2016)
☐ Butte Fire (2015)
☐ Other (please provide date and brief description of fire: _____)

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)

Location(s): **40 acres of undeveloped agricultural land in Magalia, California, 95954, Parcel 058-100-094-000;**
89.25 acres of undeveloped agricultural land in Magalia, California 95954, Parcel 065-510-083-000

9. How were you and/or your family harmed?

Check all that apply

- ☒ Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)
☒ Owner ☐ Renter ☐ Occupant ☐ Other (Please specify): _____
☐ Personal Injury
☐ Wrongful Death (if checked, please provide the name of the deceased) _____
☐ Business Loss/Interruption
☐ Lost wages and earning capacity
☐ Loss of community and essential services
☒ Agricultural loss
☐ Other (Please specify): _____

10. What damages are you and/or your family claiming/seeking?

Check all that apply

- ☒ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
☐ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
☐ Punitive, exemplary, and statutory damages
☒ Attorney's fees and litigation costs
☒ Interest
☒ Any and all other damages recoverable under California law
☐ Other (Please specify): _____

11. How much is the claim?

- ☐ \$ _____ (optional)
☒ Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Russell Reiner
Russell Reiner (Aug 19, 2020 15:49 PDT)

Email: rreiner@reinerslaughter.com

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Russell Reiner</u>		
	First name	Middle name	Last name
Title	<u>Lawyer</u>		
Company	<u>Reiner, Slaughter & Frankel</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	<u>2851 Park Marina Dr. Suite #200</u>		
	Number	Street	
	<u>Redding</u>	<u>CA</u>	<u>96001</u>
	City	State	ZIP Code
Contact phone	<u>(530) 241-1905</u>	Email	<u>rreiner@reinerslaughter.com</u>

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ I have supporting documentation.
(attach below)

☒ I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.**
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

<https://restructuring.primeclerk.com/page>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form





Electronic Proof of Claim_WRDY!27402[[CSLT#4025#CF]]

Final Audit Report

2020-08-13

Created:	2020-08-13
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAADbiV-t8SLsKTMZL4cv5QOXUcwDLpSAZw

"Electronic Proof of Claim_WRDY!27402[[CSLT#4025#CF]]" History

-  Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)
2020-08-13 - 10:42:56 PM GMT
-  Web Form filled in by Russell Reiner (rreiner@reinerslaughter.com)
2020-08-13 - 10:49:59 PM GMT- IP address: 68.189.7.226
-  (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/84.0.4147.125 Safari/537.36)
2020-08-13 - 10:50:01 PM GMT- IP address: 68.189.7.226
-  Signed document emailed to Prime Clerk E-Filing (efiling@primeclerk.com) and Russell Reiner (rreiner@reinerslaughter.com)
2020-08-13 - 10:50:01 PM GMT